

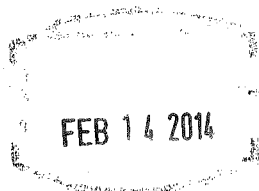


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590



REPLY TO THE ATTENTION OF:

Mr. Andrew Hall
Division of Air Pollution Control
Ohio Environmental Protection Agency
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049


Dear Mr. Hall:

The U.S. Environmental Protection Agency has reviewed the draft Plantwide Applicability Limit (PAL) permit, permit number P0113356, for Performance Manufacturing Center in Marysville, Ohio. To ensure that the source meets Clean Air Act requirements, that the permit will provide necessary information so that the basis of the permit decision is transparent and readily accessible to the public, and that the permit record provides adequate support for the decision, EPA has the following comments:

1. The permit on page 12 establishes the PALs. In establishing the PAL for Volatile Organic Compounds (VOC), the baseline actual facility-wide VOC emissions for 2004 and 2005 were used. The increase in VOC was stated at 39.9 tons of VOC to keep the increase below the Prevention of Significant Deterioration (PSD) threshold, which resulted in the adjusted baseline actual facility-wide VOC emissions of 2,121.2. It appears that the adjusted baseline of 2,121.2 is an increase of 40.2 tons of VOC, making the project major for PSD. Please provide justification for not considering this project major under PSD.
2. In the requirements listed for K004, starting on page 63 of the permit, several conditions involving use of the thermal oxidizer for VOC emissions begin with "when operating as an 'automobile or light-duty truck assembly plant.'" This statement suggests that the facility can fluctuate from being an automobile or light-duty truck assembly plant as well as the requirement to use the thermal oxidizer for VOC emissions. Please clarify the status of the facility's operation and the applicable requirements.
3. Throughout section C. of the permit, several typos appear where spaces are missing. Please look over the permit to correct the typos.

We appreciate the opportunity to provide comments on this draft permit. If you have any questions, please feel free to contact me or have your staff contact Charmagne Ackerman, of my staff, at (312) 886-0448.

Sincerely,

 for
Genevieve Damico
Chief
Air Permits Section